

The US FCC should not permit the current proposal to advance digital AM service under the iBiquity company plans for the following reasons:

1. iBiquity is a consortium owned by several of the "major" owners of radio stations throughout the US, which have effectively purchased and consolidated nearly half of the commercial radio stations in the US since enactment of the Telecom Act of 1996. The US Department of Commerce, the US Attorney General/Department of Justice and the Congress of the United States must address the fair-trade and anti-trust implications involved in this arrangement.

2. It has been reported in various broadcast trades such as Radio World (week of April 8-19), that radio stations will be required to pay iBiquity some sort of fee for use of the technology in addition to paying for the purchase of the equipment. Radio stations if forced to adopt a new broadcast standard by the federal government, i.e., FCC, should not also be forced to pay a one-time or any other type payment, especially if that payment is going to a consortium of the major radio corporations in the US. Why should independent radio stations be forced by the government to pay their competitors anything? What happened to monopoly controls in this country? The FCC is certainly overlooking this.

The FCC should and must involve the US Department of Commerce, Department of Justice and the US Congress in this decision making process before forcing independent radio stations (what few are left after the Telecom Act of 1996) to begin operating at the mercy of the giant broadcasting consolidators.